

# Exhibit 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

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JASON HINSON,

Plaintiff,

v.

KYLE MARTIN,

Defendant.

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Civil Action No. 5:17-CV-0260

**PLAINTIFF JASON HINSON'S EXPERT DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and (B) and the Amended Scheduling Order, Plaintiff Martin hereby discloses the following retained experts. Plaintiff's retained experts reserve the right to supplement their opinions if new or modified information is provided at any point, or if they have the opportunity to review further reports, literature, testimony, or other documents. The reports for Dr. Best and Mr. Burwell are attached hereto.

1. Dr. Cameron M. Best, M.D., Orthopedic Surgeon at North Louisiana Orthopaedics and Sports Medicine in Monroe, Louisiana.

Areas of Testimony: Dr. Best is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident, the scope, nature, and severity of Mr. Hinson's injuries following the incident, whether Mr. Hinson's injuries are consistent with multiple dog bites, Dr. Best's experience as a trauma surgeon, Dr. Best's experience treating patients with compartment syndrome, Dr. Best's experience treating patients with injuries sustained from dog bites, the nature, scope, and severity of Mr. Hinson's current symptoms and pain from the injuries sustained during the incident, whether Mr. Hinson will suffer long term symptoms from the injuries, and the extent of Mr. Hinson's continuing treatment and care.

2. Ernest Burwell, Former Field Training Officer, Canine Training Deputy, and Canine Handler for the Los Angeles County Sheriff's Department and a Certified California Peace Officers Standards and Training Canine Evaluator for canine teams.

Areas of Testimony: Mr. Burwell is expected to testify regarding his knowledge of generally accepted police canine training standards and procedures, his knowledge of generally accepted use of force standards and procedures, whether Defendant Martin followed appropriate police standards and procedures in deploying the canine Rex and apprehending Mr. Hinson, and whether Defendant Martin followed appropriate police standards and procedures following the apprehension of Mr. Hinson.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and (C) and the Amended Scheduling Order, Plaintiff Martin hereby discloses the following non-retained, treating physician experts.

3. Dr. Jay Edgar Dujon, M.D., General Surgeon, Trauma Surgeon, and Critical Care Surgeon at Munson Medical Center in Traverse City, Michigan.

Areas of Testimony: Dr. Dujon is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as his treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, his experience treating patients with compartment syndrome,

whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

4. Dr. Nicholas Harris, M.D., General Surgeon and Trauma Surgeon at Rapides Regional Medical Center in Alexandria, Louisiana.

Areas of Testimony: Dr. Harris is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as his treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, his experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

5. Dr. Adebayo Oluwasanu Olatokunbo Awe, M.D., General Surgeon at Louisiana State University Health in Shreveport, Louisiana.

Areas of Testimony: Dr. Awe is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as an assisting treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, his experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

6. Dr. John Raymond Shamburger Jr., M.D., Emergency Medicine Specialist at Willis-Knighton Medical Center in Shreveport, Louisiana.

Areas of Testimony: Dr. Shamburger is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as a treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, his experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

7. Dr. Elizabeth Estelle Webb, M.D., Emergency Medicine Specialist at Memorial Hospital and Health Care Center in Jasper, Indiana.

Areas of Testimony: Dr. Webb is expected to testify regarding her knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as a treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, her experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

8. Dr. Daniel Umoh, M.D., Family Physician in Mansfield, Louisiana.

Areas of Testimony: Dr. Umoh is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as a treating physician, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the reasons he recommended transfer of Mr. Hinson to the University Hospital, the condition of Mr. Hinson's arm and wrist before and after surgery, his experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

9. Cynthia Payton, M.H.S., Occupational Therapist in Shreveport, Louisiana.

Areas of Testimony: Dr. Payton is expected to testify regarding her knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as a treating occupational therapist, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the condition of Mr. Hinson's arm and wrist before and after surgery, her experience treating patients with compartment syndrome, whether Mr. Hinson's injuries are consistent with multiple dog bites, her recommendations for occupational therapy and treatment interventions following Mr. Hinson's surgery at University Hospital, and the extent of Mr. Hinson's long term symptoms and continuing care and treatment.

10. Todd Glorioso, Critical Care Transport Paramedic at Pafford Emergency Medical Services in the Virgin Islands.

Areas of Testimony: Mr. Glorioso is expected to testify regarding his knowledge of Plaintiff Hinson's symptoms, diagnosis, and treatment following the incident as a treating paramedic, the scope, nature, and severity of Mr. Hinson's injuries following the incident, the reasons Mr. Hinson was initially transferred to DeSoto Regional Hospital, the reasons Mr. Hinson was later transferred to University Hospital, the condition of Mr. Hinson's arm and wrist before surgery, his experience treating patients with injuries sustained from dog bites, and whether Mr. Hinson's injuries were consistent with multiple dog bites.

November 18, 2022

Respectfully submitted,

/s/ John Nickelson

John C. Nickelson, #32214  
Heidi Kemple Martin, #35861  
Nickelson Law PLLC  
7591 Fern Ave, Suite 1403  
Shreveport, LA 71105  
Tel: 318 678 5787  
john.nickelson@nickelsonlaw.com  
heidi.martin@nickelsonlaw.com

/s/ Ameer Frodle

Ameer Frodle (Admitted pro hac vice)  
Pratik Agarwal (Admitted pro hac vice)  
Paul Schmidt (Admitted pro hac vice)  
Covington & Burling, LLP  
850 10th St. NW  
Washington, DC 20001  
Tel: 202 662 6000  
pagarwal@cov.com  
afrodle@cov.com

Nora Ahmed (Admitted pro hac vice)  
ACLU Foundation Of Louisiana  
1340 Poydras St, Ste. 2160  
New Orleans, LA 70112  
Tel: 504 522 0628  
nahmed@laaclu.org